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Subject: Status of Ecology's FC Rate Tech. Support Document & Recognizing Lon's Work
Date: Wednesday, August 22, 2012 12:20:42 PM

Good Afternoon Sheila

I want to briefly update you on the status of Ecology's fish consumption rate report and to recognize Lon's continuing technical support.

As you know, Ted Sturdevant's "pivot" has resulted in a major redirection of the fish consumption rate report. The report does not have any recommended fish consumption rate ranges or a default fish consumption rate. The current vision is that the fish consumption rate report is a repository of regional specific fish consumption related information and tabulated rates. Risk management policies that may influence the selection of a percentile and rate from the exposure distribution have been removed from the document or have been qualified as "policy" issues that need to be addressed in the future. The Sediment Management Standards rule will not have a default fish consumption rate to derive risk-based cleanup concentrations but will refer to an RME based on tribal exposure patterns. Another draft technical support document will be finalized and, hopefully, posted on Ecology's web site this **Monday, August 27th**. Additional workgroup/committee meetings to discuss the document are in the process of being scheduled for September and October, agenda and venue yet to be determined. In response to some of these changes a coalition of tribal and environmental groups has formed (Keep Our Seafood Clean Coalition) - - the link below will provide you with information and the recent Puget Sound Partnership Resolution on Fish Consumption Rate - <http://keepseafoodclean.org/>

The pivot I just described has generated a considerable amount of work and continuing reviews and technical oversight by Ecology staff and experts. The highly respected regional expert on fish consumption is Lon. Because of the timing of the Mr. Sturdevant's pivot and the publication date of draft of the fish consumption rate report, the timing of the review cycles have been shortened to one week. Of all the comments I received from the reviewers of the document, Lon's comments were the most constructive, easily understood, and, most importantly, Martha (my supervisor) and I could quickly incorporate into the document. I cannot emphasize enough how critical Lon's input has been and the important role he has played in the development of the document. In addition, Lon has provided critical technical oversight in the statistical evaluations of national and regional-specific fish dietary information. I hope to continue to draw on Lon's expertise and technical, sometimes spiritual, guidance as the fish consumption technical support document continues through this short but labor intensive process with continuing public dialogue. I know that Lon has a lot of competing demands on his time and talents but I hope that the completion of this document remains a priority for you and EPA Region-10 and that Ecology can continue to rely on Lon's help to finalize and publish the final version of the technical support document by November 2012.

Thanks, regards, Craig